



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

November 24, 2003

Certified Mail No.: 7000 1670 0013 9128 7406

Mr. Mark Hobbs
Plant Manager
Seneca Foods Corporation
P.O. Box 460
25 North 6th Street
Payette, ID 83661

RE: AIRS Facility No. 075-00002, Seneca Foods Corp., Payette
Facility Name Change

Dear Mr. Hobbs:

The Department of Environmental Quality (DEQ) is issuing amended Tier II Operating Permit No. T2- 030047 to Seneca Foods Corp. in Payette in accordance with IDAPA 58.01.01.400 through 406, *Rules for the Control of Air Pollution in Idaho (Rules)*.

The enclosed Tier II operating permit is based on information contained in Seneca Foods Corp.'s June 2, 2003 permit application. This Tier II permit is effective immediately and incorporates updated terms and conditions of Tier II Operating Permit No. 075-00002, issued to Chiquita Processed Foods May 2, 2000. Modification to and/or renewal of this Tier II permit shall be requested in a timely manner in accordance with the *(Rules)*.

Tom Krinke of the Boise Regional Office will contact you regarding a meeting with the DEQ to discuss the permit terms and requirements. The DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/BR/sd Permit No. T2-030047
Enclosure

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cc: Sherry Davis, Air Quality Division

Bill Rogers, Permit Coordinator

Tom Krinke, Boise Regional Office

Bob Baldwin, Permit Writer

Marilyn Seymore, Air Quality Division (Ltr. only)

Reading File



**Air Quality
TIER II OPERATING PERMIT**

State of Idaho
Department of Environmental Quality

PERMIT NO.: T2-030047

AIRS FACILITY NO.: 075-00002

AQCR: 063

CLASS: SM

SIC: 2032

ZONE: 11

UTM COORDINATE (km): 505.0 , 4880.0

1. PERMITTEE

Seneca Foods Corporation

2. PROJECT

Amended Tier II Operating Permit

3. MAILING ADDRESS

P.O. Box 460, 25 North 6th Street

CITY

Payette

STATE

ID

ZIP

82661

4. FACILITY CONTACT

Mark Hobbs

TITLE

Plant Manager

TELEPHONE

208-642-6367

5. RESPONSIBLE OFFICIAL

Russ Grubb

TITLE

Operations Director of Idaho

TELEPHONE

208-642-6326

6. EXACT PLANT LOCATION

25 North 6th Street, Payette, Idaho

COUNTY

Payette

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Manufacturer of soups and specialty products

8. PERMIT AUTHORITY

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented in the application and the Department of Environmental Quality's (DEQ) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to DEQ review in accordance with Section 58.01.01.200 of the *Rules for the Control of Air Pollution in Idaho*.


C. STEPHEN ALLRED, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: November 24, 2003

DATE EXPIRES: May 9, 2005

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Acronyms, Units, and Chemical Nomenclatures

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
DEQ	Department of Environmental Quality
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometers
lb/day	pound per day
PM	particulate matter
SIC	Standard Industrial Classification
SM	synthetic minor
T/yr	tons per any consecutive 12-month period
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-030047

Permittee:	Seneca Foods Corp.	AIRS Facility No. 075-00002	Date Issued:	November 24, 2003
Location:	Payette, Idaho		Date Expires:	May 9, 2005

1. TIER II OPERATING PERMIT SCOPE***Purpose***

- 1.1 This Tier II operating permit establishes enforceable limitations on the facility's potential to emit. This permitting action is an administrative amendment which transfers ownership of this permit from Chiquita Processed Foods to Seneca Foods Corp.
- 1.2 This Tier II operating permit incorporates and replaces the following permit:
 - Tier II Operating Permit No. 075-00002, issued May 9, 2000

Regulated Sources

- 1.3 Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
3	Can manufacturing	None

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2. FACILITY-WIDE CONDITIONS***Fugitive Emissions***

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
 - Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
 - Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
 - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
 - Paving of roadways and their maintenance in a clean condition, where practical.
 - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Odors

- 2.4 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
- 2.5 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

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Visible Emissions

- 2.6 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, oxides of nitrogen, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

Excess Emissions

- 2.7 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

Open Burning

- 2.8 The permittee shall comply with the requirements of the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-616.

Reports and Certifications

- 2.9 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 North Orchard
Boise, Idaho 83706
Phone: (208) 373-0550
Fax: (208) 373-0504

Obligation to Comply

- 2.10 Receiving a Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

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3. CAN MANUFACTURING

- 3.1 Various coating used in the can manufacturing process result in the emissions of VOC's and glycol ethers. Emissions associated with the can manufacturing process are uncontrolled.

Emissions Limits**3.2 Glycol Ethers and VOC Emissions Limits – Can Manufacturing Process**

- Glycol ethers and VOC emissions from the can manufacturing process shall not exceed any corresponding emissions rate limits listed in Tables 3.1 or 4.1.

Table 3.1 CAN MANUFACTURING PROCESS EMISSIONS LIMITS

Source Description	Glycol Ethers		VOC	
	lb/day	T/yr	lb/day	T/yr
Can manufacturing	90.7	9.5	954	95.7

3.3 End Line Cleaning VOC Emissions Limits

- VOC emissions from the solvent used to clean End Lines 1, 2, and 3 shall not exceed 28 lb/day.
- VOC emissions from the solvent used to clean End Lines 1, 2, and 3 shall not exceed 400 lb/yr.

Operating Requirements

- 3.4 Finished can unit production shall not exceed 1,440,000 can units per day and 300,000,000 can units per any consecutive 12-month period. A can unit consists of 1 can body and 2.2 can ends.
- 3.5 The VOC content of the side seam coatings shall not exceed 65% by weight.
- 3.6 The VOC content of the end coatings shall not exceed 70% by weight.
- 3.7 The glycol ethers content of the side seam coatings shall not exceed 31% by weight.
- 3.8 The glycol ethers content of any coatings used shall not exceed 63.0 pounds glycol ethers per 1,000,000 finished can units produced.
- 3.9 The VOC content of any coatings, sealants, and process solvents used shall not exceed 637 pounds of VOCs per 1,000,000 finished can units produced.

Monitoring and Recordkeeping Requirements

- 3.10 The permittee shall monitor and record the VOC emissions, expressed as pounds of VOC's per day and pounds of VOC's per year, from the solvents used to clean End Lines 1, 2, and 3 to demonstrate compliance with Permit Condition 3.3. Daily VOC emissions shall be determined by multiplying the VOC content (percent by weight), the mass density (pounds per gallon), and the amount (gallons per day) of the solvents used. Annual VOC emissions shall be determined by summing daily VOC emissions monthly, and then summing the monthly VOC emissions over the previous consecutive 12-month period.

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These records shall remain onsite for the most recent five-year period and shall be made available to DEQ representatives upon request.

- 3.11 The permittee shall monitor and record the finished can unit production daily and annually to demonstrate compliance with Permit Condition 3.4. To determine the annual finished can unit production, the permittee shall sum the daily finished can unit production monthly, and then sum the monthly finished can unit production over the previous consecutive 12-month period. These records shall remain onsite for the most recent five-year period and shall be made available to DEQ representatives upon request.
- 3.12 The permittee shall monitor and record the VOC content, expressed as percent by weight (%/wt), of all coatings used for the side seam coating process to demonstrate compliance with Permit Condition 3.5. These records shall remain onsite for the most recent five-year period and shall be made available to DEQ representatives upon request.
- 3.13 The permittee shall monitor and record the VOC content, expressed as percent by weight (%/wt), of all coatings used for the end coating process to demonstrate compliance with Permit Condition 3.6. These records shall remain onsite for the most recent five-year period and shall be made available to DEQ representatives upon request.
- 3.14 The permittee shall monitor and record the glycol ethers content, expressed as a percent by weight (%/wt), of all coatings used for the side seam coating process to demonstrate compliance with Permit Condition 3.7. These records shall remain onsite for the most recent five-year period and shall be made available to DEQ representatives upon request.
- 3.15 The permittee shall monitor and record the glycol ethers content of all coating used, expressed as pounds of glycol ethers per 1,000,000 finished can units produced, to demonstrate compliance with Permit Condition 3.8. These records shall remain onsite for the most recent five-year period and shall be made available to DEQ representatives upon request.
- 3.16 The permittee shall monitor and record coating, sealant, and process solvent VOC content, expressed as pounds of VOC's per 1,000,000 finished can units produced, to demonstrate compliance with Permit Condition 3.9. These records shall remain onsite for the most recent five-year period and shall be made available to DEQ representatives upon request.

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4. SUMMARY OF EMISSION RATE LIMITS

Table 4.1 provides a summary of all emission rate limits required by this permit.

Table 4.1 SUMMARY OF EMISSION RATES LIMITS

Seneca Foods Corp., Payette Emission Limits^a – daily (lb/day), and Annual^b (T/yr)				
Source Description	Glycol Ethers		VOC	
	lb/day	T/yr	lb/day	T/yr
Can manufacturing	90.7	9.5	954	95.7

^a As determined by a pollutant-specific EPA reference method, a DEQ-approved alternative, or as determined by the DEQ's emissions estimation methods used in this permit analysis.

^b As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

^c Includes condensibles.

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5. TIER II PERMIT GENERAL PROVISIONS

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101 et seq.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
3. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
 - To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
4. Except for data determined to be confidential under Section 9-342A *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
5. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter; a copy of which shall be forwarded to the Director.
7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to become void.
8. The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the DEQ. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.